

Before the  
**Federal Communications Commission**  
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	GEN Docket No. 90 - 314
Amendment of the Commission's	)	
Rules to establish New Personal	)	RM-7140, RM-7175, RM-7618
Communications Services	)	
	)	
	)	

REPLY OF THE MANAGER OF THE NATIONAL COMMUNICATIONS SYSTEM  
 TO COMMENTS ON AND OPPOSITIONS TO PETITIONS FOR RECONSIDERATION

The Secretary of Defense, Executive Agent of the National Communications System (NCS), through duly authorized counsel, pursuant to Section 201 of the Federal Property and Administrative Services Act of 1949, 40 USC Section 481, and the Memorandum of Understanding between the Department of Defense and the General Services Administration dated November 27, 1950, on behalf of the Manager of the NCS, files this Reply to the various Comments On and Oppositions To the Petitions for Reconsideration.

In a Petition for Reconsideration (Petition) filed December 8, 1993 in this proceeding, the Manager urged that the Commission involve itself, or at least provide direction, in the development of PCS standards to help ensure that interoperability and nationwide roaming would become a reality. The Petition stated the Commission's acknowledged responsibilities to consider National Security and Emergency Preparedness concerns could not be satisfied without such

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participation or direction. The Petition was filed after the Commission, in the Second Report and Order (Order) herein, acknowledged the desirability of interoperability and nationwide roaming, but decided to adopt a "flexible" approach to standards development. The Commission noted that several industry technical and standards groups were addressing technical standards for PCS both domestically and internationally and encouraged those efforts. (Order, paragraphs 136 - 138.)

#### INTEROPERABILITY AND NATIONWIDE ROAMING

The Manager is unable to identify a party to this proceeding who has come out against interoperability or the ability to roam nationwide. The differences are in how those goals might be achieved and when. A review of the comments and oppositions received on the various Petitions for Reconsideration reveals the following positions on equipment standards:

Telephone and Data Systems, Inc. (TDS) supports the Motorola position that the Commission should take steps to see that a national standard be implemented as quickly as possible and urges the Commission to address timeframes for interoperability and nationwide roaming.<sup>1</sup>

GTE recognizes that prompt development of industry equipment standards will be necessary to allow roaming, but disagrees with the Telecommunications Industry Association that it should increase its involvement in developing those standards. According to GTE, the

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<sup>1</sup>Comments on Technical Issues of Telephone and Data Systems, Inc. pages 2 and 3.

Commission should not attempt to define PCS equipment requirements, but should rely on industry standards bodies.<sup>2</sup>

NEXTEL argues that the Commission should not impose compatibility standards for PCS, and supports the Commission's decision to leave to industry and the marketplace the task of ensuring interoperability and nationwide roaming.<sup>3</sup>

MCI is willing to continue to cooperate in the development of voluntary industry standards, supports the Commission's "hands-off" approach, and urges rejection of the Motorola and TIA positions insofar as they urge the Commission to make compliance with "voluntary" industry standards mandatory for PCS providers.<sup>4</sup>

The Manager does not now suggest that the Commission should impose or promulgate any particular PCS equipment standards and recognizes that the scope of PCS services, and hence the type of equipment to be used, remains somewhat undefined at this time. That there are various industry standards groups addressing equipment standards can cut two ways, however. The various groups bring different perspectives and possible solutions to the issue, but could develop incompatible standards. It is the Manager's position that the Commission should do more than "monitor" those groups. Appropriate interoperability and nationwide roaming equipment standards will be developed much more quickly if the Commission would affirmatively require rather than simply

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<sup>2</sup>Comments of GTE Service Corporation, page 12.

<sup>3</sup>NEXTEL Communications, Inc. Opposition to Petitions for reconsideration, pages 15 and 16.

<sup>4</sup>MCI Opposition, pages 21 and 22.

urge (Order, para. 138) that those groups consider interoperability and nationwide roaming as desirable goals.

#### CONCLUSION

The Commission can satisfy its obligation to consider National Security and Emergency Preparedness concerns by requiring (rather than simply "urging") that standards groups consider interoperability and nationwide roaming capabilities for PCS. The Manager recognizes that such standards will not be developed overnight, but the Commission should insist that immediate attention be given to this important aspect of PCS.

Respectfully submitted,



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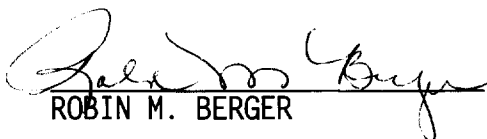
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